



Order Filed on June 19, 2021  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**Robertson, Anschutz, Schneid, Crane & Partners,  
PLLC**

Authorized Agent for Secured Creditor  
130 Clinton Road, Lobby B, Suite 202  
Fairfield, NJ 07004  
Telephone: 973-575-0707  
Facsimile: 973-404-8886

Harold Kaplan (HK0226)

In Re:

**Donna Bello,**

**Debtor,**

Case No.: 17-20067-MBK

Chapter: 13

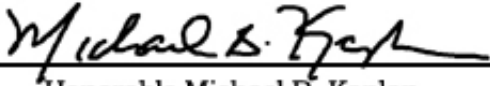
Hearing Date: June 9, 2021

Judge: Michael B. Kaplan

**AGREED ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby  
ORDERED.

DATED: June 19, 2021

  
Honorable Michael B. Kaplan  
United States Bankruptcy Judge

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Secured Creditor: U.S. Bank National Association, not in its individual capacity but solely as Trustee of NRZ Inventory Trust

Secured Creditor's Counsel: Robertson, Anschutz, Schneid, Crane & Partners, PLLC

Debtors' Counsel: Candyce Ilene Smith-Sklar, Esq.

Property Involved ("Collateral"): 17 Remsen Street, Trenton, New Jersey 08610

Relief sought:           ■ Motion for relief from the automatic stay  
                              □ Motion to dismiss  
                              □ Motion for prospective relief to prevent imposition of automatic stay against the collateral by debtor's future bankruptcy filings

For good cause shown, it is **ORDERED** that Secured Creditor's Motion(s) is (are) resolved, subject to the following conditions:

1. Status of post-petition arrearages:

- The Debtor is overdue for 12 months from June 1, 2020 through May 1, 2021.
- The Debtor is overdue for 3 payments from June 1, 2020 at \$719.99 per month.
- The Debtor is overdue for 1 payment from September 1, 2020 at \$735.89 per month.
- The Debtor is overdue for 8 payments from October 1, 2020 at \$763.34 per month.

Funds Held In Suspense \$307.61.

Total Arrearages Due \$8,694.97.

2. Debtor must cure all post-petition arrearages, as follows:

- Immediate payment shall be made in the amount of \$2,500.00. Payment shall be made within 10 days of entry of this Order.
- Beginning on June 1, 2021, regular monthly mortgage payments shall continue to be made in the amount of \$763.34.
- The remaining balance in the amount of \$6,194.97 shall be capitalized in the Debtor's Chapter 13 plan and paid to Secured Creditor by the Chapter 13 Trustee in addition to the amount set forth on Secured Creditor's timely filed Proof of Claim. Debtor must file an Amended Plan, and Schedules I and J within fifteen (15) days of the entry of this Order. The Debtor's monthly payment to the Chapter 13 Trustee will be modified to an amount necessary to appropriately fund the plan in accordance with this order.

3. Payments to the Secured Creditor shall be made to the following address(es):

- Immediate cure payment: NewRez LLC dba Shellpoint Mortgage Servicing  
P.O. Box 740039  
Cincinnati, Ohio 45274-0039
- Regular monthly payment: NewRez LLC dba Shellpoint Mortgage Servicing  
P.O. Box 740039  
Cincinnati, Ohio 45274-0039

4. In the event of Default:

■ Should the Debtor(s) fail to make any of the above captioned payments, or if any regular monthly mortgage payment or Trustee payments should become more than thirty (30) days late or if Debtor(s) fails to comply with any terms of this Consent Order, counsel shall file a Certification of Default with the Court. A copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ In the event the Debtor(s) convert(s) to a Chapter 7 during the pendency of this bankruptcy case, the Debtor(s) shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtors fail to bring the loan contractually current, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, Chapter 7 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ This agreed order survives any loan modification agreed to and executed during the instant bankruptcy. If any regular mortgage payment due after the execution of a loan modification is more than thirty (30) days late, counsel shall file a Certification of Default with the Court a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

5. Award of Attorneys' Fees:

- The Applicant is awarded attorney fees of \$350.00 and costs of \$188.00.

The fees and costs are payable:

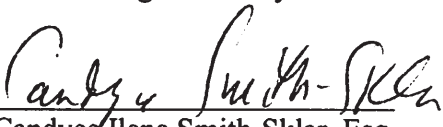
- Through the Chapter 13 plan.

☐ To the Secured Creditor within \_\_\_\_\_ days.

☐ Attorneys' fees are not awarded.

6. In the event Secured creditor has not filed a timely Proof of Claim, Debtor consents to the filing and payment by the Chapter 13 Trustee of any late filed Proof of Claim, subject to the right of the Debtor to file an objection as to the amount.

The undersigned hereby consent to the form and entry of the foregoing order.

  
Candyce Ilene Smith-Sklar, Esq.  
Attorney for Debtor(s)  
Date:

/s/Harold Kaplan  
\_\_\_\_\_  
Harold Kaplan, Esq.  
Attorney for Secured Creditor  
Date: 6/9/2021